

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

WASHINGTON MUTUAL BANK,  
Plaintiff,  
v.  
DAN W. ADAMS, HEIDI K. ADAMS,  
UNITED STATES OF AMERICA,  
COMMONWEALTH OF  
MASSACHUSETTS DEPARTMENT OF  
REVENUE, DELTA FUNDING  
CORPORATION and BENEFICIAL  
MASSACHUSETTS INC.,  
Defendants.

## REQUEST FOR DEFAULT

I, Mary Ellen Manganello, attorney for the above-named plaintiff, Washington Mutual Bank, (“Washington Mutual”), pursuant to Fed. R. Civ. P. 55, state that the Complaint in which a judgment for affirmative relief is sought against the defendant, Beneficial Massachusetts Inc., herein, was filed on August 15, 2005. The summons and a copy of the complaint was served on Beneficial Massachusetts, Inc. on August 17, 2005, as appears from the officer’s return filed with this court. The time within which Beneficial Massachusetts, Inc. was granted to serve a responsive pleading, or otherwise defend, has expired and Beneficial Massachusetts, Inc. herein has failed to serve or file an answer or otherwise defend the Complaint.

WHEREFORE, Plaintiff makes application that Beneficial Massachusetts, Inc. be defaulted.

Respectfully Submitted,

WASHINGTON MUTUAL BANK,  
By its attorneys,

/s/ Mary Ellen Manganelli  
Donn A. Randall (BBO #631590)  
J. Patrick Kennedy (BBO #565778)  
Mary Ellen Manganelli (BBO #641658)  
Bulkley, Richardson and Gelinas, LLP  
One Post Office Square, Suite 3700  
Boston, MA 02109  
Tel: 617-368-2500  
Fax: 617-368-2525

Dated: September 13, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the defendant, Beneficial Massachusetts, Inc. by mail on September 13, 2005.

/s/ Mary Ellen Manganelli  
Mary Ellen Manganelli